

ORIGINAL

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**Cincinnati Bell™**

a Broadwing company

201 E. Fourth St.  
P.O. Box 2301  
Cincinnati, Ohio 45201-2301

July 12, 2002

RECEIVED

JUL 12 2002

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Marlene H. Dortch  
Federal Communications Commission  
445 Twelfth Street, S.W.  
Washington, D. C. 20554

RE: **Ex Parte Notification**

Implementation of the Pay Telephone Reclassification and Compensation  
Provisions of the Telecommunications Act of 1996  
CC Docket No. 96-128

Dear Ms. Dortch:

On July 11, 2002 Denny Reuss, Roger Ryan, Kimothy Smith and the undersigned from Cincinnati Bell Telephone Company met with Jeffrey Carlisle, Lynne Milne, Lenworth Smith, and Joshua Swift of the Wireline Competition Bureau. We discussed the processes and procedures employed by the National Payphone Clearinghouse in computing and distributing payphone dial-around compensation. The discussion followed the attached presentation, from which confidential and proprietary information has been redacted.

Pursuant to Section 1.1206 of the Commission's rules, an original and one copy of this notice are being filed with the Office of the Secretary. Any questions may be directed to me at (513) 397-6671.

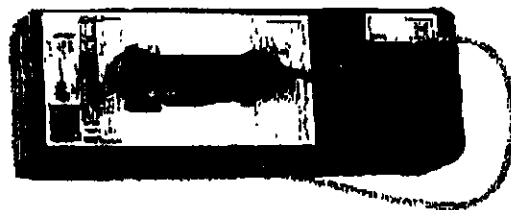
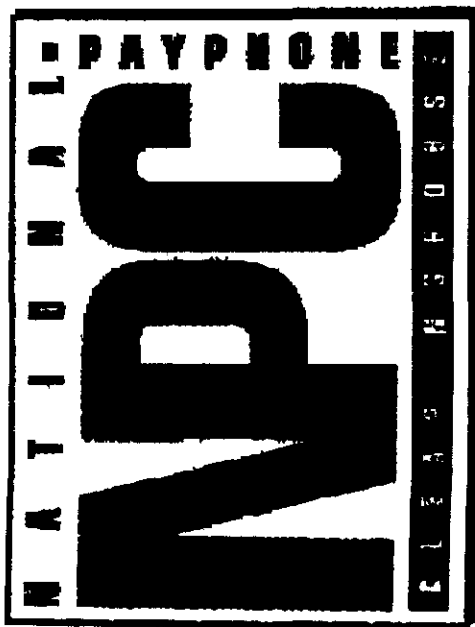
Sincerely,

Patricia L. Rupich  
Regulatory Analyst

Attachment

cc: Jeffrey Carlisle  
Lynne Milne  
Lenworth Smith  
Joshua Swift

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List ABCDE



# National Payphone

# Clearinghouse

Established 1992

*Industry Leader in the Processing of Dial-Around Compensation*



# AGENDA

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- **Introduction/History**
- **Quarterly Process Overview**
- **Validation/Dispute Resolution Overview**
- **Documentation Available via NPC Website**
- **Hardware Overview**



# **A Brief History**

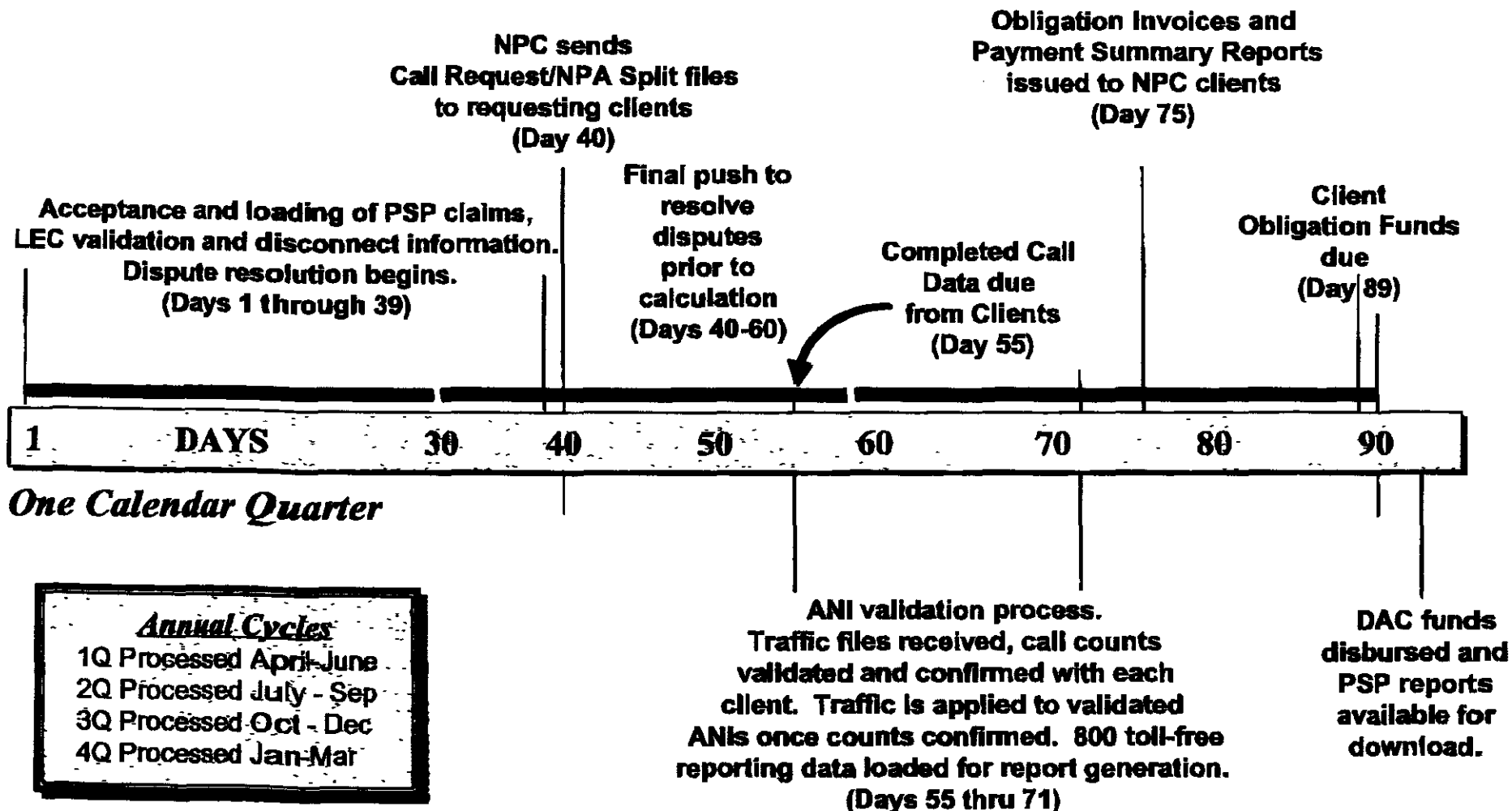
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- ❖ **Created in 1992 in response to CC Docket No. 91-35**
- ❖ **At inception, represented AT&T, MCI (now WorldCom), and Alascom**
- ❖ **December 31, 1992 - issued first checks based on the \$6.00 per phone flat rate**
- ❖ **1<sup>st</sup> Quarter 1995 - began issuing per call compensation on behalf of AT&T**
- ❖ **1<sup>st</sup> Quarter 1996 - began issuing per call compensation on behalf of MCI**
- ❖ **NPC currently employs three managers, five clerical staff members, and nine technical team members**
- ❖ **NPC represents 18 clients – equating to approximately 75% of all the dial-around compensation issued**

# NATIONAL PAYPHONE CLEARINGHOUSE

## 90-DAY CYCLE TIMELINE

The NPC processes compensation payments, one quarter in arrears, on a calendar basis. NPC commitment is to disburse funds as early as the 1<sup>st</sup> business day of quarter and no later than 5<sup>th</sup> business day. If payment is to be later, industry notification is issued.





# Days 1 – 30

- **PSP/Aggregators and LEC/RBOC/CLECs submissions (Types of media received: paper, disk, and CDs for manual and batch loading.)**
  - **NPC loads PSP/Aggregators compensation claims**
  - **NPC begins loading LEC/RBOC/CLECs validation ANIs /disconnected ANIs**
- **Manual dispute resolution for prior quarters' unpaid claims**
- **Power-of-Attorneys and Power-of-Managers obtained and loaded**
- **Direct deposit accounts established**

# Data Sets

## LEC Report

- Listing of all COCOT lines working on last day of current plus four previous open quarters, but not previously reported.
- Consists of line number (ANI) and PSP billing name and address (BNA).
- Listing of all COCOT disconnects for current processing quarter.

## PSP Claims

- Listing of all PSP-owned COCOT lines working, but not previously claimed, for current plus four previous open quarters.
- Contains PSP billing name and address (BNA).



*National Payphone Clearinghouse*

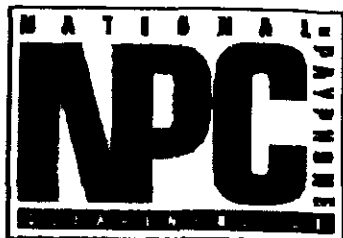


# Days 31 – 60

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- NPC continuing to load PSP/Aggregator claims through Day 39
- NPC continuing to load LEC/RBOC/CLEC validation ANIs/disconnected ANIs through Day 60
- NPC produces Call Request File and NPA Split File for clients
- Clients compile and submit completed call traffic and 800 toll-free reporting data
- NPC confirms client traffic counts and loads traffic
- Dispute resolution continues through Day 60
  - PSP/Aggregators submit dispute resolution documentation through Day 40
- ANI validation begins





# Days 61 – 74

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- **ANI validation completed**
- **NPC applies client traffic to validated ANIs**
- **NPC loads 800 toll-free reporting data**
- **NPC system calculates clients' dial-around obligations**



# **Days 75 – 90**

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- **NPC issues invoices to clients for dial-around obligations by Day 75**
- **NPC prepares direct deposit file, checks, and wires**
- **NPC prepares PSP/Aggregator end-of-quarter report files and notification letters for the PSP/Aggregators**
- **NPC prepares client end-of-quarter reports**
- **NPC collects clients' funds**

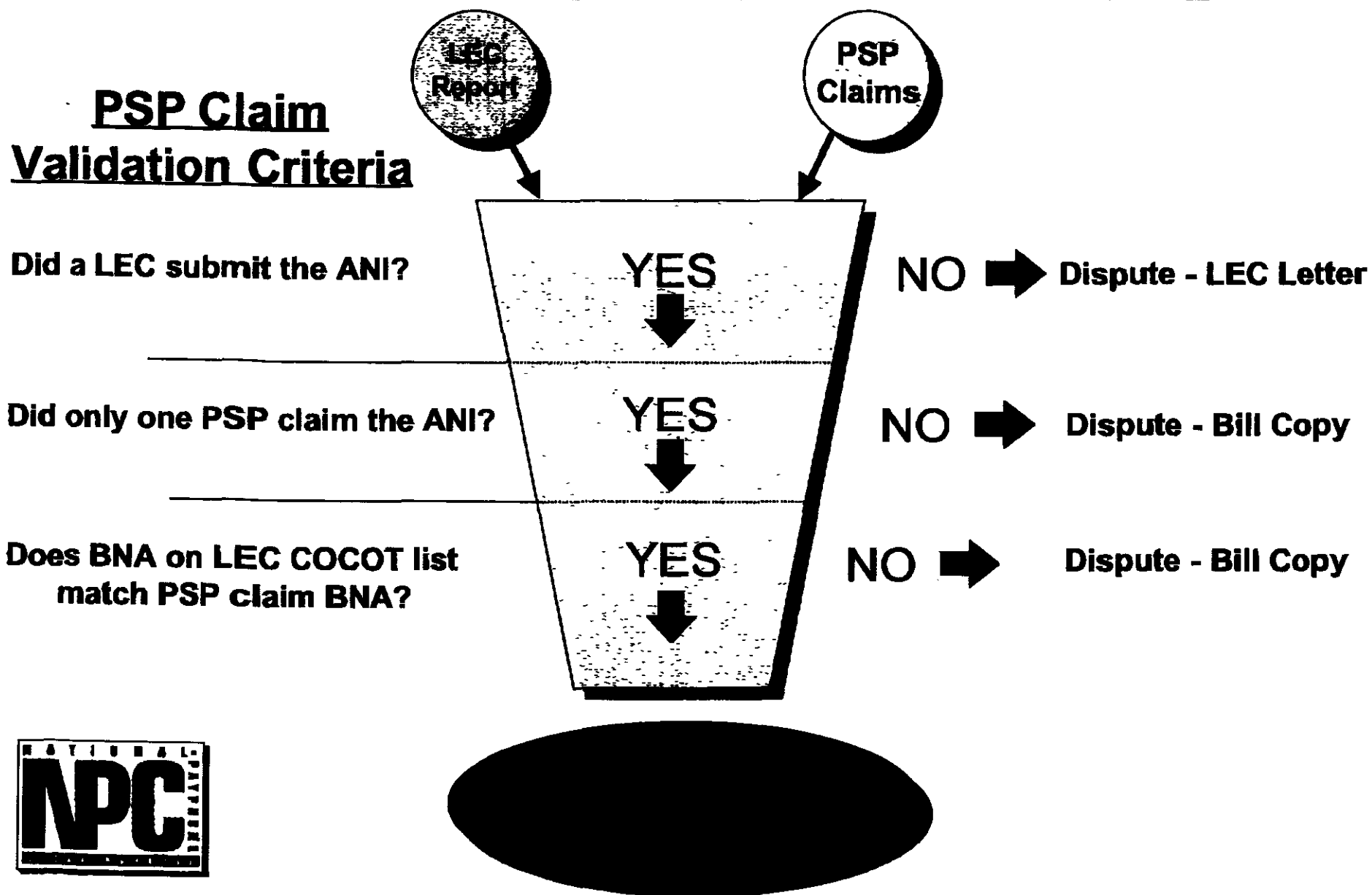


# Days 91 – 100

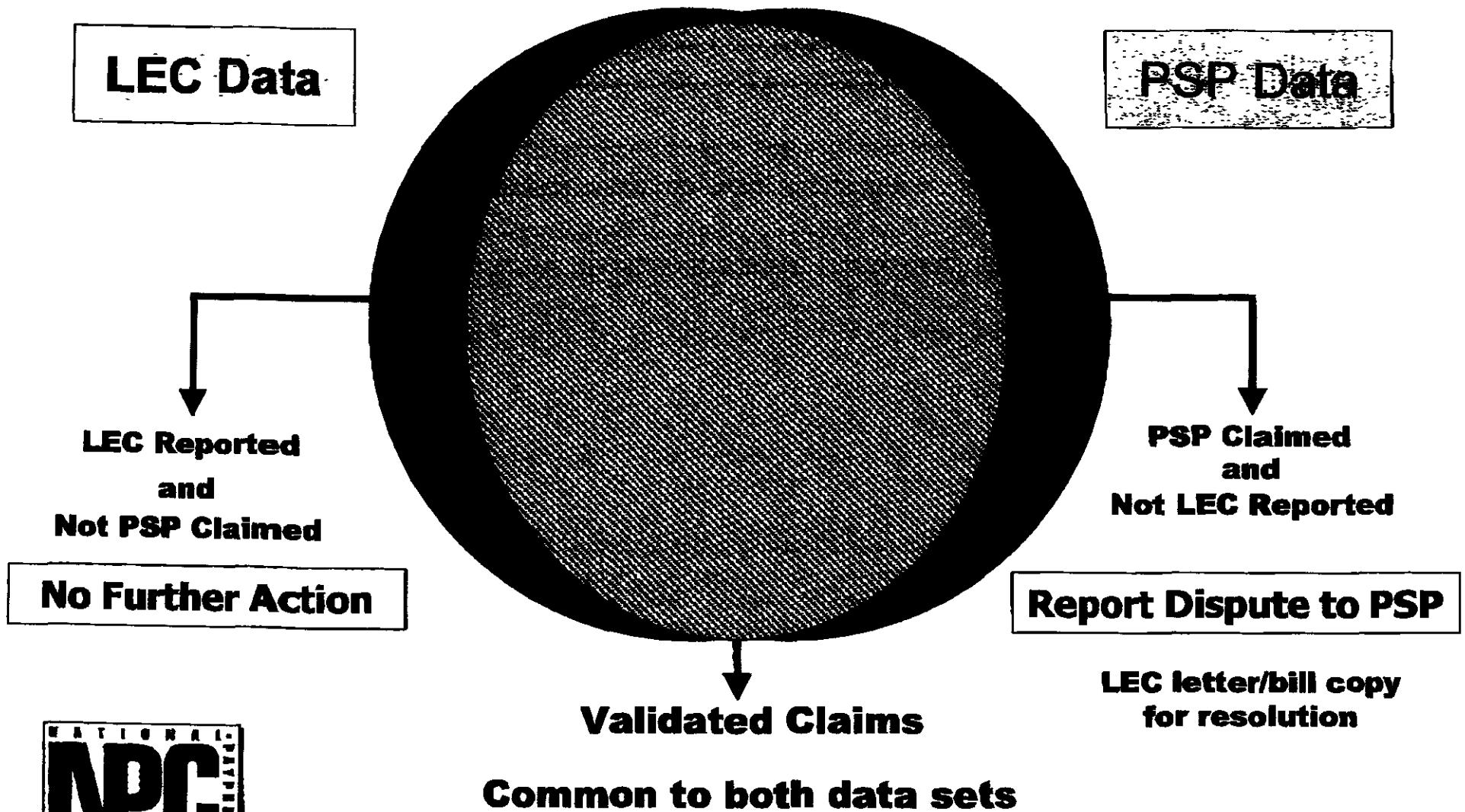
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- **NPC releases dial-around funds**
- **NPC issues invoices to clients for services rendered**
- **NPC rolls system's data to ready process for upcoming quarter**

# Primary Validation Edits – The Comparison Process



# NPC Actions Taken – Post Comparison



# Documentation Available to PSPs/Aggregators

The following files are available via the NPC's website ([www.NPC.cc](http://www.NPC.cc)) and can assist PSPs/Aggregators with the creation of their quarterly payphone claim submission. The NPC "HELP" section provides directions to open end-of-quarter files.

## General PSP Information



- New PSP Information Package (New PSPs - 10/1/99)
- Required W-9 Form from the US Government (All new vendors to the US Govt website)
- Background Compensation Keyword Checklist (New Vendors)
- Current Client List (Current)
- History Dump File (New) - NPC History Dump File (Current - 2/99)
- Drafted Claim Submission - NPC History Dump File (Current - 2/99)
- Sample Submission - NPC History Dump File (Current - 2/99)

# Documentation Available to PSPs/Aggregators

## PSP Claim Information



- Quarterly PSP Claim Invoice (Npsqlvcl.doc)
- Quarterly PSP Claim Schedule (Psp\_bill.doc)
- ANI Claim Form - Paper Quarterly Claim (Using Data 23 ANIs or less) (DIALAROUNDLIST.doc)
- Sample PSP Claim (Sample1.doc)
- Sample PSP Data Disk Layout Using a Text Format (Pspfmt.doc)
- Sample PSP Data Disk Layout Using a Spreadsheet Format (pspsmt-spreadht.doc)
- How to Deal with Area Code Splits (Ac\_3info.doc)
- Re-submission of ANIs with Area Code Splits (Ac\_Resub.doc)
- Planned Area Code Splits (Npspslt.doc - 5 pages)
- Re-submission Right Number/Wrong Number ANIs (RNo\_WrongNo2.doc)

## Dispute Resolution Information

- Generic Dispute Resolution Form (Dispute.doc)
- Pure Error 12 Disk Resolution (Per\_12.doc)
- The DOs and DON'Ts of Disputes (Disputes.doc)

# Documentation Available to LECs/CLECs/RBOCs

The following files are available via the NPC's website ([www.NPC.cc](http://www.NPC.cc)) and can assist LECs/CLECs/RBOCs with the creation of their quarterly COCOT report.

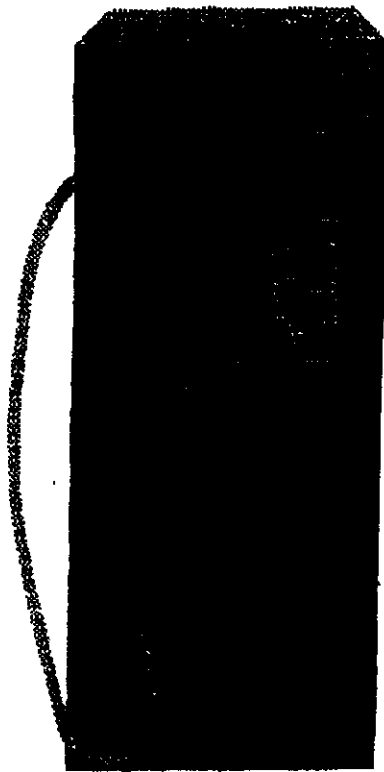
## LEC Reporting Information



- LEC Reporting Information (LEC\_Reporting\_Information.doc)
- Sample LEC Data File (Sample LEC Data File.doc)
- Sample LEC Data File Using a .CSV File Format (LECDataFormat\_090810.doc)
- LEC Quarterly COCOT Report (Sample LEC Quarterly COCOT Report.doc)
- FCC Letter Outlined Requirements for Quarterly LEC Reporting of COCOT Data (LEC\_090810.doc)
- Disconnect Reporting (Disconnect.doc)
- Format for Reporting Data (Format for Reporting Data.doc)
- LEC Reporting Information (LEC\_Reporting\_Information.doc)
- Format for Reporting Data (Format for Reporting Data.doc)







# **NATIONAL PAYPHONE CLEARINGHOUSE**

*201 East 4th Street, Room 102-980, Cincinnati, OH 45201*

**☎ (513) 397 - 6260**

**Fax (513) 721-COIN**

**Website [www.npc.cc](http://www.npc.cc)**

- **THE CLEARINGHOUSE ACTIVITIES**
- **QUARTERLY DATA/INVOICE SUBMISSIONS**
- **THE COMPARISON PROCESS**
- **DISPUTES**
- **MINIMIZING DISPUTES**

The Clearinghouse is open 8am to 5pm EST Monday - Friday.

*Revised July 2, 2002*



# COMPANIES REPRESENTED BY NPC FOR DIAL-AROUND COMPENSATION

Abbr.	Full Name of Companies Represented	Effective Date of Representation	Last Quarter Represented	After this end-date ...
ACI	ACI - Ameritech	4Q1997	3Q2000	See WCG
ALASKA	Alascom	2Q1999		
ATT	AT&T (Includes ACC Telecom, Inc. effective 2Q2000)	2Q1992		
BROAD	Broadwing/IXC	1Q2000		
BRW	Broadwing/IXC	1Q2000		
BT	Broadwing Telecom, Inc. (BT)	1Q1999		
CNTL	Century Tel	1Q2001	4Q2001	See WCOM
CBLD	Cincinnati Bell Long Distance	4Q1997	4Q1999	See BROAD
EXCEL	Excel Telecommunications, Inc./Telco Holdings (Includes Telco Communications, AKA Telco Development Group, Telelobe Business Solutions or Telco Holdings, and eMeritus Communications.**)	4Q1998*		
GBLX	Global Crossing Telecomm. Inc. (Formerly Frontier Comm.)	4Q1999		
ICIX	Intermedia Communications Inc. (Includes both LDS & NTC of Florida effective 3Q1999)	3Q1999#		
LDS	Long Distance Savers	1Q1998*	3Q1999#	See ICIX
MCI	MCI / Worldcom (Includes MCI & WorldCom effective 1Q1999)	1Q1999		
NWP	Network Plus	1Q2001		
TOUCH	Touch-Tel	1Q2001		
USWES	United Communications International (Formerly USWES)	4Q1997		
WCG	Williams Communication Group (Includes ACI - Ameritech effective 3Q2000)	3Q2000**		
WCOM	Worldcom	4Q1998	4Q1998	See MCI/WC

\*NOTE: Although representation was effective 1Q1998 or 4Q1998, the NPC will compensate for these companies effective with 4Q1997's claims.

\*\*NOTE: Although representation was effective 3Q2000, the NPC will compensate for this company effective with 4Q1999 claims. Also, ACI - Ameritech was acquired by WCG - Williams beginning 4Q2000 processing quarter.

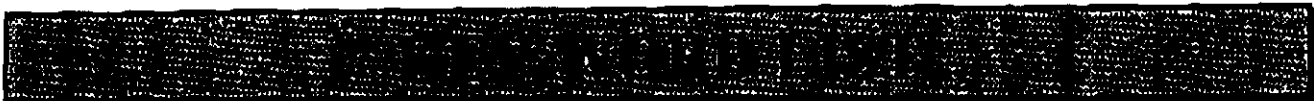
#NOTE: Both LDS and NTC of Florida were acquired by Intermedia. Beginning with 3Q1999 processing, all new validated claims for LDS or NTC of Florida will be reported as Intermedia.

\*\*\*NOTE: The TDG ACNA is now owned by eMeritus Comm - this is a name change; PSPs will continue to get payments for eMeritus Comm from Excel Comm. Please note that Telelobe & Telelobe Business Solutions are two different companies - Excel Comm does not pay compensation for Telelobe.

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BROADWING INC.



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- ⇒ **ANI** - Telephone number being submitted for compensation
  - ⇒ **CLEC** (Certified Local Exchange Carrier or Competitive Local Exchange Carrier or reseller)  
- A competitor that buys blocks of exchanges from the LEC, then resells that service to customers
  - ⇒ **COCOT** (Customer Owned Coin Operated Telephone) - A privately owned payphone
  - ⇒ **COPT** - Customer Owned Pay Telephone
  - ⇒ **FCC** - Federal Communications Commission
  - ⇒ **IXC** (Inter-Exchange Carrier) - A long distance company
  - ⇒ **LEC** (Local Exchange Carrier) - The local telephone company providing dial tone.
  - ⇒ **NPA/NXX** - Area Code and Exchange
  - ⇒ **Quarter** - Compensation may be claimed for one of four calendar quarters:

- 1st quarter - January 1st through March 31st
  - 2nd quarter - April 1st through June 30
  - 3rd quarter - July 1st through September 30th
  - 4th quarter - October 1st through December 31st

These 4 time periods are the *only* valid intervals for which compensation may be claimed.

- ⇒ **PSP** - Payphone Service Provider- private payphone owner
- ⇒ **SPLIT** - Geographically dividing an existing NPA and assigning a new NPA to a portion of the area

- 
- Accept and load quarterly data from LECs and PSPs.
  - Compare the two sets of data.
  - Issue checks or Direct Deposit (NPC Deposit Authorization Form.doc) on matched ANIs.
  - Issue a standard (electronic) data file layout (NPC Industry Dump File Layout.doc) at the end of the quarter.
  - Facilitate the dispute resolution process.
  - The Clearinghouse goal - to provide an efficient vehicle for the compensation process.
- 

- Claims should be submitted on a quarterly basis in the proper format (Pspfmt.doc or pspfmt\_sprdsht.doc).
- Claim lines **ACTIVE** at the end of the quarter.
- Invoices (Npcinv2.doc) must be submitted with Data submission as of the last business day of the first month of each quarter. Any claims received after the deadline (Psp\_data.doc) will be held over until the next payment. Absolutely no exceptions!
- Acceptable media: 3 1/2" diskette, CD-ROM, or paper (DIALAROUNDLIST.doc if claiming less than 25 ANIs).
- Claims should be submitted via diskette or CD-ROM whenever possible.
- Any PSP claiming **more than 25 lines** **MUST** SUBMIT via diskette or CD-ROM.
- All Data should be formatted to the specifications provided (Pspfmt.doc or pspfmt\_sprdsht.doc).
- All diskettes and CD-ROMs **must** also be accompanied by a National Payphone Clearinghouse paper invoice (Npcinv2.doc) containing the name and address of the owner as well as a note indicating the number of lines being claimed for each quarter enclosed. The Clearinghouse provides a standardized PSP Invoice and other forms on our WebSite at ([www.npc.cc](http://www.npc.cc)). A PSP Invoice (Npcinv2.doc) is also enclosed with the forms in this packet.
- Please send your diskette in a diskette mailer to avoid damage to your diskette.

- A National Payphone Clearinghouse ID Number will be provided upon your first quarterly submission to the Clearinghouse. This ID should be used on ***all*** subsequent filings.
- Your quarterly list of ANIs should ***match*** the **billing name and address** ***exactly*** as it appears on ***your*** monthly LEC bills.
- The NPC recommends that anyone sending in claims within one week of the CLAIM deadline, send their claims via Express Mail or overnight delivery such as FedEx or UPS to ensure timely delivery.
- Please send only **ONE** Quarterly CLAIM to the Clearinghouse address. The CLAIM will be applied to **ALL** the Carriers (Colist.xls) that the NPC represents.
- NOTE: All Confidential/Proprietary information received by the NPC becomes the property of the NPC and is non-returnable!

The comparison process matches on three levels:

1. Does the ANI claimed by the PSP appear in the LEC database?
2. Has *another* PSP claimed the same ANI?
3. Does the billing name and address submitted by the PSP match the information provided by the LEC?

This comparison process generates either a matched, compensable ANI, or a dispute.

The three most prevalent dispute types are:

**ERROR 012** – ANI claimed was ***not*** reported by the LEC

**ERROR 013** – ANI claimed by ***more than one*** PSP

**ERROR 014** – PSP data does ***not*** match the LEC records

**ERROR 012 Resolution -**

PSP must contact the LEC and have the LEC submit written verification that the ANI was in place on the ***last day*** of the quarter in dispute (Dispfrm2.doc). August 1, 2000, the NPC published a format that made it possible to resolve Pure Error Code 12 Disputes (Perr12.doc) on a diskette. This must be in a text layout and the Payphone Owner or Aggregator will complete the first part of the disk. Then the Payphone Owner or Aggregator will send it to their LEC



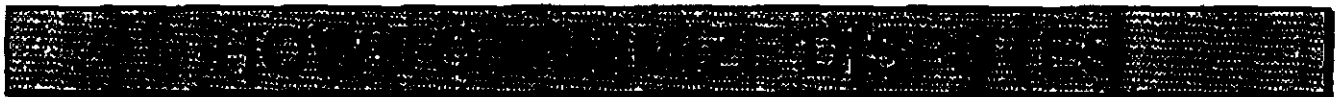
to complete the remaining fields. The LEC will then return the completed disk to the NPC by the 10<sup>th</sup> day of the 2<sup>nd</sup> month of each quarter to resolve these Pure Error 12 (Perr12.doc) disputes. The LEC will need to return the completed disk with a cover letter to the NPC verifying that this information is from them.

**ERROR 013 Resolution -** Clearinghouse will compensate the PSP who matches the LEC data. The PSP **must** submit a copy of the LEC bill from the *last* month of the quarter in dispute.

**ERROR 014 Resolution -** PSP must submit a copy of the LEC bill from the *last* month of the quarter in which it is being claimed.

**DISPUTES** remain active and open for resolution for 6 quarters only. Any lines, which are disputed and subsequently resolved, ***will be included*** on the *next* quarters check run.

Checks or Direct Deposit (NPC Deposit Authorization Form.doc) are issued once a quarter. These check will include undisputed claims for the current quarter ended, as well as any previous quarter's disputed claims that have been resolved.



1. Submit your claim information ***exactly*** as it appears on your LEC bills. Be careful to submit **correct Area Codes** after Area Code splits occur (Npasplit.doc).
2. If you have more than one billing address, submit one PSP header record for each unique ANI per billing address. (These header records should use the same National Payphone Clearinghouse ID# and be followed by the ANIs belonging to each address.)
3. Work with your serving LECs to have your billing name and address information report in a consistent format. This is especially true for the Zip Code.

## **PSP - Data Claims**



PSP claims are due by the **last** business day of the **first** month following the end of **each calendar quarter**.

*For 2002, the due dates are as follows:*

- ☆ **First quarter claims are due by  
April 30 – Checks mailed in July**
- ☆ **Second quarter claims are due by  
July 31 – Checks mailed in October**
- ☆ **Third quarter claims are due by  
October 31 – Checks Mailed In January**
- ☆ **Fourth quarter (2002) claims are due by  
January 31, 2003 – Checks mailed in April**

**Please Note:** *Any quarterly PSP claims not received in the Clearinghouse by the close of the business day of the first month of each quarter will be considered late. Any late claims will be held over and processed with the subsequent quarter's work.*

For questions, please call (513) 397-6260, or FAX this to us at (513) 721-COIN (2646)

Website [www.npc.cc](http://www.npc.cc)

201 East 4th Street, Room 102-980, Cincinnati, OH 45201

Invoice Date: \_\_\_\_\_ ☐ Please ✓ this box if this is an Address **CHANGE!**

Company Name: \_\_\_\_\_

☐ Please ✓ this box if this is a COMPANY NAME change!

Company Address: \_\_\_\_\_

Company Address: \_\_\_\_\_

City

State

Zip Code

E-MAIL Address: \_\_\_\_\_

☐ Please ✓ this box if this is a new e-mail Address!

Company Phone No. (\_\_\_\_\_) \_\_\_\_\_

Company Fax No. (\_\_\_\_\_) \_\_\_\_\_

NPC ID: \_\_\_\_\_

(Note: new IDs are only 5 digits)

(New owners will be assigned an ID by the NPC.)

### **Requesting Compensation for the following Quarter(s):**

(Please do not submit actual ANIs on this form. ANIs must be submitted separately.)

QTR/YR: \_\_\_\_/\_\_\_\_ Total number of ANIs: \_\_\_\_\_

(Use additional spaces below if submitting multiple/old quarters.)

QTR/YR: \_\_\_\_/\_\_\_\_ Total number of ANIs: \_\_\_\_\_

QTR/YR: \_\_\_\_/\_\_\_\_ Total number of ANIs: \_\_\_\_\_

QTR/YR: \_\_\_\_/\_\_\_\_ Total number of ANIs: \_\_\_\_\_

QTR/YR: \_\_\_\_/\_\_\_\_ Total number of ANIs: \_\_\_\_\_

I, the undersigned, attest that all of the payphones being submitted on this invoice for dial around compensation are all payphones as defined by the FCC in the 1996 report and order as: "any telephone made available to the public on a fee-per-call basis, independent of any commercial transaction, for the purpose of making telephone calls, whether the telephone is coin-operated or is activated either by calling collect or using a calling card. This definition of 'payphone' excludes from the compensation mechanism phones in hotel rooms, dormitory rooms, or hospital rooms.

Signature of Payphone Owner or Payphone Owner's Representative:

(Required)

☐ Please ✓ this box if this is a new Contact Name!

(Typed or Printed Name)

(Title)

**NOTE: ALL CONFIDENTIAL/PROPRIETARY CLAIM INFORMATION RECEIVED BY THE NPC BECOMES THE PROPERTY OF THE NPC AND IS NONRETURNABLE!**

# NATIONAL PAYPHONE CLEARINGHOUSE DIAL-AROUND COMPENSATION ANI LIST

(\*This list is to be used only for submitting ANIs for which you are claiming dial-around compensation. When submitting more than 25 ANIs, you must submit on a disk. Please prepare a National Payphone Clearinghouse invoice to accompany this claim.)

Date: \_\_\_\_/\_\_\_\_/\_\_\_\_

**COMPANY NAME:** \_\_\_\_\_

(\*NOTE: company name must be the same as it appears on your telephone bill.)

**ADDRESS:** \_\_\_\_\_

**CITY:** \_\_\_\_\_ **STATE:** \_\_\_\_\_ **ZIP:** \_\_\_\_\_

**CONTACT NAME:** \_\_\_\_\_

**OFFICE #** \_\_\_\_\_ **/ FAX #** \_\_\_\_\_

**E-MAIL ADDRESS:** \_\_\_\_\_

**NPC Acct.#** \_\_\_\_\_ **/ CLAIM QTR/YR -** \_\_\_\_\_

\_\_\_\_/\_\_\_\_/\_\_\_\_/\_\_\_\_/\_\_\_\_

(Make sure QTR's apply to all ANIs listed below.)

**PLEASE LIST ALL PAYPHONE NUMBERS (INCLUDING AREA CODE):**

1.	10.	18.
2.	11.	19.
3.	12.	20.
4.	13.	21.
5.	14.	22.
6.	15.	23.
7.	16.	24.
8.	17.	25.
9.		

**NOTE:** Enter company name as it appears on your telephone bill. If company has more than one billing name or address, please provide information on second sheet with appropriate ANIs.

**NOTE:** ALL CONFIDENTIAL/PROPRIETARY CLAIM INFORMATION RECEIVED BY THE NPC BECOMES THE PROPERTY OF THE NPC AND IS NONRETURNABLE!

**Mail to: National Payphone Clearinghouse OR FAX to # (513) 721-COIN (2646)**  
**201 East 4<sup>th</sup> St. - Room 102-980**  
**Cincinnati, OH 45201**

**SAMPLE CLAIM  
(25 LINES OR LESS)**

**Date**

**Your Company Letterhead** *(include street address, city, state, and zip code)*

**Dear Clearinghouse:**

Please accept this as my claim for dial-around compensation from each of the carriers contracted to the National Payphone Clearinghouse. The ID assigned to me by your Clearinghouse is 01234.  
*(Note: owners submitting for the first time do not yet have an ID assigned).*

I would like to claim the following 6 ANIs for 4Q2001:

345-555-0505

345-555-0506

Next number

Next number

The billing name and address for these lines is

John Doe

Anybody's Payphones

1234 Generic Lane

Anytown, OH 12345

345-555-0707

345-555-0708

The billing name and address for these lines is

John Doe DBA Corner Drug Store

456 Pharmacy Dr.

Anytown, OH 12345

*(You can group all ANIs being billed to a particular billing name and address together. If you have ANIs being billed to a different name and address, please list them under that billing name and address.)*

In addition, I would like to claim the following 2 lines for 3Q2001:  
*(If claiming more than one quarter.)*

345-555-0707

345-555-0708

The billing name and address for these lines is

John Doe DBA Corner Drug Store

456 Pharmacy Dr.

Anytown, OH 12345

I would like to claim 1 line for 2Q2001:

345-555-0707

The billing name and address for this line is

John Doe DBA Corner Drug Store

456 Pharmacy Dr.

Anytown, OH 12345

Thank you,  
Your signature

Attach a signed National Payphone Clearinghouse invoice to your letter and mail to us at:

National Payphone Clearinghouse

201 East 4th Street

Room 102-980

Cincinnati, OH 45201

*If you have any questions, please call 513-397-6260, or fax us at 513-721-COIN(2646).*

**NOTE: ALL CONFIDENTIAL/PROPRIETARY CLAIM INFORMATION RECEIVED BY THE NPC BECOMES THE PROPERTY OF THE NPC AND IS NONRETURNABLE!**